UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,   )
)
        Plaintiff,   )
)   Case No. 05-40050-FDS
    v.   )
)
JAMES J. SCAVONE, JR., executor   )
of the Estate of James J. Scavone,)
Sr., and as Trustee of the   )
Scavone Realty Trust,   )
)
PATRICK F. SCAVONE, Trustee of   )
the Scavone QTIP Trust,   )
)
MARY M. DURETTE, Trustee of the   )
Scavone QTIP Trust, and   )
)
PHILLIP L. SCAVONE, Trustee of   )
the Scavone QTIP Trust,   )
)
        Defendants.   )

UNITED STATES' CERTIFICATION UNDER
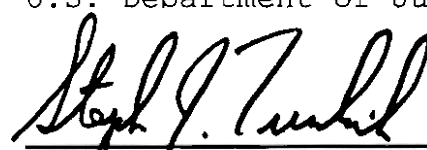LOCAL RULE 16.1(D)(3)

    The United States of America, by its attorney, Michael

Sullivan, United States Attorney for the District of

Massachusetts, submits the following pursuant to Mass. R.

16.1(D)(3)

    D. Patrick Mullarkey is the Chief of the Civil Trial

Section, Northern Region, Tax Division, Department of Justice,

and has settlement authority in the above-captioned case.

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Stephen J. Turanchik is the Trial Attorney for the Department of Justice assigned with primary responsibility for the above-captioned case.

The undersigned affirm that they have conferred (1) with a view to establishing a budget for the costs of conducting the full course - and various alternative courses - for the litigation; and (2) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

D. PATRICK MULLARKEY
Chief, Civil Trial Section
Northern Region, Tax Division
U.S. Department of Justice

STEPHEN J. TURANCHIK
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
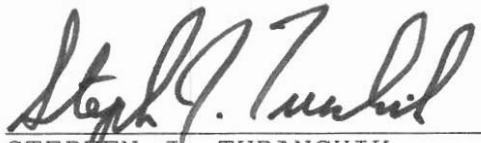Telephone: (202) 307-6565

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I hereby certify that a true copy of this United States'
Certification under Rule 16.1(D)(3) was served upon

John F. Shoro, Esq.
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James J. Scavone, Jr.
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Patrick F. Scavone
3 Timber Heights Drive
Charlton, MA 01507

this   5th   day of December, 2005.

_____
STEPHEN J. TURANCHIK
U.S. Department of Justice
Tax Division, Northern Region

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